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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

REARDEN LLC, et al.,

**Plaintiffs,**

V.

THE WALT DISNEY COMPANY, *et al.*,

## Defendants.

No. 4:17-CV 04006-JST-SK  
No. 4:17-CV-04191-JST-SK

**DECLARATION OF MARK S.  
CARLSON IN OPPOSITION TO  
DEFENDANTS' MOTION TO  
EXCLUDE PORTIONS OF  
DECLARATION OF ANGELA  
TINWELL**

Judge: Hon. Jon S. Tigar

Date: To be set

Time: To be set

Ctrm.: 6, 2<sup>nd</sup> Floor

REARDEN LLC, et al.,

**Plaintiffs,**

V.

TWENTIETH CENTURY FOX FILM  
CORPORATION, *et al.*,

### Defendants.

DECLARATION OF MARK CARLSON IOT  
PLAINTIFFS' MOTION TO EXCLUDE  
Case No. 4:17-cv-04006; -4191-JST

1 I, MARK CARLSON, declare as follows:

2 1. I am an attorney with Hagens Berman Sobol Shapiro LLP, and I am one of the firm's  
3 lawyers representing the plaintiffs in this case. I have personal knowledge of the facts stated in this  
4 declaration, and could testify with respect to those facts under oath if called upon to do so.

5 2. The document attached as Exhibit 1 is a true and correct copy of excerpts from the  
6 transcript of the deposition of Angela Tinwell cited in Rearden's Opposition to Defendants' Motion  
7 to Exclude Poritons of the Declaration of Angela Tinwell.

8 3. The document attached as Exhibit 2 is a true and correct copy of the *curriculum vitae*  
9 of Angela Tinwell, which was attached to her declaration as Exhibit 2, ECF No. 264-18. At my  
10 request, Dr. Tinwell highlighted the publications that (a) she relied upon in forming the opinions  
11 expressed in her declaration, and (b) were subject to peer review, as shown on Exhibit 1 hereto.

12 4. The document attached as Exhibit 3 is a true and correct copy of excerpts from the  
13 deposition of Hao Li cited in Rearden's Opposition to Defendants' Motion to Exclude Poritons of the  
14 Declaration of Angela Tinwell.

15 5. The document attached as Exhibit 4 is a true and correct copy of the "Home" web  
16 page for MOVA, <http://www.mova.com>, which was accessed at my direction on January 8, 2021.

17 6. The document attached as Exhibit 5 is a true and correct copy of the "Gallery :  
18 CONTOUR Reality Capture Examples" web page for MOVA, <http://www.mova.com/gallery.php>,  
19 which was accessed at my direction on January 8, 2021.

20 7. The document attached as Exhibit 6 is a true and correct copy of a web page titled  
21 "TRON: Legacy Movie Review" dated December 13, 2010,  
22 <https://www.shockya.com/news/2010/12/13/tron-legacy-movie-review>, which was accessed at my  
23 direction on Janaury 14, 2021.

24 8. The document attached as Exhibit 7 is a true and correct copy of a web page titled  
25 "Film Review: TRON: Legacy" dated December 17, 2020,  
26 <http://www.fanthefiremagazine.com/film/film-review-tron-legacy/>, which was accessed at my  
27 direction on Janaury 14, 2021.

1       9. The document attached as Exhibit 8 is a true and correct copy of a web page titled  
2 "Film Review: TRON: Legacy" dated December 17, 2020, <https://cine-vue.com/2010/12/film-review-tron-legacy.html>, which was accessed at my direction on Janaury 14, 2021.

4       10. The document attached as Exhibit 9 is a true and correct copy of a web page titled  
5 "Visually stunning but bumnumbing Tron" dated December 9, 2010,  
6 <https://www.smh.com.au/entertainment/movies/visually-stunning-but-bum-numbing-tron-20101209-18qmj.html>, which was accessed at my direction on Janaury 14, 2021.

8       11. The document attached as Exhibit 10 is a true and correct copy of a web page titled  
9 "TRON: Legacy -Disney+ Talk" dated April 15, 2020,  
10 <https://battleroyalewithcheese.com/2020/04/tron-legacy-disney-talk/>, which was accessed at my  
11 direction on Janaury 14, 2021.

12       12. The document attached as Exhibit 11 is a true and correct copy of a web page titled  
13 "Jeff Bridges Double Feature: True Grit andTron: Legacy" dated December 28, 2010,  
14 [https://www.huffpost.com/entry/jeff-bridges-double-featu\\_b\\_798615](https://www.huffpost.com/entry/jeff-bridges-double-featu_b_798615), which was accessed at my  
15 direction on Janaury 14, 2021.

16       13. The document attached as Exhibit 12 is a true and correct copy of a web page titled  
17 "The Curious Case of Benjamin Button", <https://www.tvguide.com/movies/curious-case-benjamin-button/review/293210>, which was accessed at my direction on Janaury 14, 2021.

19       14. The document attached as Exhibit 13 is a true and correct copy of a web page titled  
20 "See 'Benjamin Button,' just don't try to guess his age",  
21 [https://usatoday30.usatoday.com/life/movies/reviews/2008-12-23-benjamin-button\\_N.htm](https://usatoday30.usatoday.com/life/movies/reviews/2008-12-23-benjamin-button_N.htm), which  
22 was accessed at my direction on Janaury 14, 2021.

23       15. The document attached as Exhibit 14 is a true and correct copy of a web page titled  
24 "'Button' Bends Time Into Grand Fable" dated December 25, 2008,  
25 <https://www.wsj.com/articles/SB123015087021633387>, which was accessed at my direction on  
26 Janaury 14, 2021.

1 I declare that the foregoing is true and correct under penalty of perjury.

2 DATED: January 15, 2021

Signed in Seattle, Washington, by:

3 */s/ Mark Carlson*

4 Mark Carlson

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